

# **EXHIBIT 1**

**Rig Baldwin V**

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**From:** Rig Baldwin V  
**Sent:** Thursday, April 25, 2019 4:13 PM  
**To:** Duke, Neil  
**Subject:** RE: April 11 letter

Please call me Rig.

I will respond shortly. Is there a particular urgency? I am happy to meet and confer if you want to get a motion filed.

Unrelatedly, the email address on both letters is not mine, so I actually did not get the first letter until Friday.

Rignal W. Baldwin V

**BALDWINLAW LLC**

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**From:** Duke, Neil <[n duke@bakerdonelson.com](mailto:n duke@bakerdonelson.com)>  
**Sent:** Thursday, April 25, 2019 4:04 PM  
**To:** Rig Baldwin V <[RBaldwinV@baldwinlawllc.com](mailto:RBaldwinV@baldwinlawllc.com)>  
**Subject:** RE: April 11 letter

Dear Mr. Baldwin:

I'll keep this correspondence brief. Let me know if you have a response to my most recent letter, dated April 21st. I just wanted to ensure that I haven't missed anything. My thanks,

**Neil E. Duke**

Shareholder

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represents clients across the U.S. and abroad from offices  
in Alabama, Florida, Georgia, Louisiana, Maryland, Mississippi,  
South Carolina, Tennessee, Texas, Virginia and Washington, D.C.

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**From:** Rig Baldwin V [mailto:[RBaldwinV@baldwinlawllc.com](mailto:RBaldwinV@baldwinlawllc.com)]  
**Sent:** Tuesday, April 16, 2019 4:45 PM  
**To:** Duke, Neil  
**Subject:** RE: April 11 letter

Mr. Duke,

I can't answer your Thursday (touché) letter until the factual questions I have raised are addressed.

As an alternative to providing you with my work product, I propose that you ask Mr. Reitz to forward you a copy of the MPIA complaint when we file and serve it. That way, you can enjoy your vacation, and I can avoid what feels like the onset of a case of excited delirium, which according to my very old copy of the DSM can be very bad for me.

Rignal W. Baldwin V

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**From:** Duke, Neil <[nduke@bakerdonelson.com](mailto:nduke@bakerdonelson.com)>  
**Sent:** Tuesday, April 16, 2019 4:04 PM  
**To:** Rig Baldwin V <[RBaldwinV@baldwinlawllc.com](mailto:RBaldwinV@baldwinlawllc.com)>  
**Subject:** Re: April 11 letter

Mr. Baldwin -

Thank you for your communication, and responses to my Thursday, April 11th letter. I most certainly will respond, fully, at my earliest convenience. I have explained my short-term travel circumstances. In the interim, feel free to forward to me the emails that you have been sending to the agent(s) of the Baltimore County Police Department (or other persons), to achieve compliance with plaintiffs' MPIA requests. Alternatively, for simplicity sake, if that is too great a challenge, you may elect to just provide me the name(s) of said person(s). Much appreciated.

Sent from my iPad

On Apr 16, 2019, at 9:39 PM, Rig Baldwin V <[RBaldwinV@baldwinlawllc.com](mailto:RBaldwinV@baldwinlawllc.com)> wrote:

Mr. Duke,

You sent me a letter on Friday asking that I respond "at my earliest convenience." After doing a considerable amount of research, I did so.

The letter contains an assertion that I "communicat[ed] with a represented party in an active lawsuit." The implication is that I have violated the Maryland Rules of Professional Conduct. The letter also seems to imply that I have violated a local rule, the MPIA, and a yet-to-be-issued discovery order.

I think it is inappropriate to make insinuations about the performance of a fellow attorney, copy to five other attorneys, and be unavailable to clarify your position, source of legal authority, or factual basis.

I ask that you withdraw your April 11 letter.

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Regarding your email below, I have made inquiries to the County Attorney, Michael Field, Esquire, as to whether or not Baker Donelson represents him and/or his office. I did not make an inquiry to "Baltimore County." Mr. Field's role is defined by Baltimore County Code. Please explain, at your earliest convenience, how an inquiry to him is an inquiry to "Baltimore County."

Rignal W. Baldwin V

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**From:** Duke, Neil <[nduke@bakerdonelson.com](mailto:nduke@bakerdonelson.com)>  
**Sent:** Tuesday, April 16, 2019 3:01 PM  
**To:** Rig Baldwin V <[RBaldwinV@baldwinlawllc.com](mailto:RBaldwinV@baldwinlawllc.com)>  
**Subject:** Re: April 11 letter

Dear Counsel-

As a means of providing greater clarity, I return to my desk on Monday. At which time, I will respond to both of your inquiries. Namely, of me, and of my client, Baltimore County. Thanks for your patience.

Sent from my iPad

On Apr 15, 2019, at 5:53 PM, Rig Baldwin V <[RBaldwinV@baldwinlawllc.com](mailto:RBaldwinV@baldwinlawllc.com)> wrote:

Mr. Duke,

Could you send me a copy of Baker Donelson's retainer agreement(s) with Baltimore County so that I can appropriately respond to your letter? Normally, it is something I would request pursuant to the MPIA, but in this instance I thought it would be better to simply ask you. I have looked online and was unable to find it on Baltimore County's procurement website.

Thanks,

Rig

Rignal W. Baldwin V

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